

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

FILED

NOV 19 2019

U.S. DISTRICT COURT-WVND
MARTINSBURG, WV 25401

UNITED STATES OF AMERICA,

v.

JEFFREY ALLEN JOHNSON,

Defendant.

Criminal No.

3:19cr61

Violations:

18 U.S.C. § 2252A(a)(2)(A)

18 U.S.C. § 2252A(a)(5)(A)

18 U.S.C. § 2252A(a)(5)(B)

18 U.S.C. § 2252A(b)(1)

18 U.S.C. § 2252A(b)(2)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Distribution of Child Pornography)

On or about December 3, 2018, in Berkeley County, within the Northern District of West Virginia, the defendant **JEFFREY ALLEN JOHNSON**, did knowingly distribute child pornography, that involves a visual depiction of sexually explicit conduct, where the production of such visual depiction involves the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and Title 18, United States Code, Section 2252A(b)(1).

COUNT TWO

(Possession of Child Pornography)

On or about May 2, 2019, in Berkeley County, within the Northern District of West Virginia, defendant **JEFFREY ALLEN JOHNSON**, did knowingly possess an image of child pornography, as defined in Title 18, United States Code Section 2256(8), which had been transported in interstate and foreign commerce by computer, and that involved a pre-pubescent minor who had not attained 12 years of age; in violation of Title 18, United States Code, Sections 2252A(a)(5)(A) and Title 18, United States Code, Section 2252A(b)(2).

FORFEITURE ALLEGATION

(Sexual Exploitation of Children)

Pursuant to Title 18, United States Code, Section 2253, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter, any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, and any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from a violation of Title 18, United States Code, Section 2252A, including the following items all seized from the defendant:

- Container with nine (9) thumb drives
- Samsung SSD - SIN: SIDBNSCF4098889A
- WD Blue PC Hard Drive - SIN: WCC6YQJJSR5T
- Seagate hard drive- SIN: 6QF1 YJSH
- Toshiba laptop- SIN: Z451 L YSFS WK 7
- LG cellphone
- Apple iPhone 6S
- LG cellphone
- Apple iPad
- HP laptop - SIN: 5CH142170Y

A True Bill,

/s/
Grand Jury Foreperson

/s/
WILLIAM J. POWELL
United States Attorney

Kimberley D. Crockett
Assistant United States Attorney